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22 *Green, John Zimmer, Brian Roberts, Prashant*
23 *(Sean) Aggarwal, Ben Horowitz, Valerie Jarrett,*
24 *David Lawee, Hiroshi Mikitani, Ann Miura-Ko,*
25 *and Mary Agnes (Maggie) Wilderotter*

26 *Additional Counsel on Signature Page*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

29 In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

30 This Document Relates to:

31 ALL ACTIONS

32 **JOINT STIPULATION AND**
ORDER TO EXTEND BRIEFING
SCHEDULE ON LEAD PLAINTIFF'S
MOTION FOR LEAVE TO FILE
[PROPOSED] SECOND AMENDED
CLASS ACTION COMPLAINT

1 Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,
 2 Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett,
 3 David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the “Lyft
 4 Defendants”) and Lead Plaintiff Rick Keiner (the “Plaintiff,” and together with the Lyft
 5 Defendants, the “Parties”), through their counsel, submit the following Joint Stipulation and
 6 [Proposed] Order To Extend Briefing Schedule on Lead Plaintiff’s Motion for Leave to File
 7 [Proposed] Second Amended Class Action Complaint (ECF No. 206).

8 WHEREAS, on September 30, 2021, Lead Plaintiff Rick Keiner filed a Motion for Leave
 9 to File [Proposed] Second Amended Class Action Complaint (the “Motion” or “Motion for
 10 Leave”) (ECF No. 206);

11 WHEREAS, the Lyft Defendants’ Opposition to the Motion (the “Opposition”) is due to
 12 be filed on October 14, 2021, and Plaintiff’s Reply in support of the Motion (the “Reply”) is due
 13 to be filed on October 21, 2021;

14 WHEREAS, the hearing on the Motion is scheduled for February 3, 2022;

15 WHEREAS, the Parties have met and conferred and agree to extend the date for the filing of
 16 the Opposition from October 14, 2021, to November 30, 2021, and the date for the filing of
 17 the Reply from October 21, 2021, to January 7, 2022;

18 WHEREAS, there will still be ample time for the Court to consider the Opposition and
 19 Reply prior to the hearing on the Motion, and this extension of time will not alter the date of any
 20 event or deadline already fixed by Court order;

21 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
 22 subject to Court approval, that the briefing schedule for the Motion for Leave will be modified as
 23 follows:

24 1. The Lyft Defendants shall file their Opposition to the Motion for Leave by
 25 November 30, 2021; and

26 2. Plaintiff shall file a Reply in support of his Motion for Leave by January 7, 2022.

1 Dated: October 14, 2021

2 Stipulated and agreed to by:

3

4 **BLOCK & LEVITON LLP**

5 /s/ Jeffrey C. Block

6 Jeffrey C. Block (*admitted pro hac vice*)
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*Lead Counsel and Counsel for Plaintiff
and the Class*

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/s/ Colleen C. Smith

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24 Mikitani, Ann Miura-Ko, and Mary Agnes
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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: October 14, 2021

/s/ Colleen C. Smith

Colleen C. Smith

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 10/15/2021

Haywood S. Gill Jr.
HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE